

John M. Thomas, OSB #024691
E-Mail: jthomas@rcolegal.com
Routh Crabtree Olsen, P.C.
11830 SW Kerr Parkway, Suite 385
Lake Oswego, OR 97035
Phone (503) 517-7180
Fax (425) 457-7369

Attorneys for Defendant HSBC Bank USA, NA

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

JUSTIN JAMES AND NICOLE JAMES;

Plaintiffs

v.

FREMONT REORGANIZING COMPANY,
FKA FREMONT INVESTMENT & LOAN
COMPANY; BRIDGE CAPITAL
CORPORATION; HSBC BANK USA, NA;

Defendants.

Case No. 3:08-CV-397-BR

DEFENDANT HSBC BANK USA, NA's
FIRST UNOPPOSED MOTION TO
EXTEND DISPOSITIVE MOTION &
OTHER CASE MANAGEMENT
DEADLINES

I. LR 7.1 CERTIFICATION

Pursuant to L.R. 7.1(a)(1)(A), HSBC's counsel has conferred with counsel for Plaintiffs and Co-Defendants, and they consent to this motion.

II. MOTION

Pursuant to FRCP 6(b), defendant HSBC respectfully moves the Court for a 30-day extension of the remaining case management deadlines established by the Court, including the dispositive motion deadline (currently, April 5, 2010).

The reasons for this motion are as follows: (1) Defendants need additional time to finalize affidavits of witnesses, due to vacation and travel schedules; (2) the parties are

attempting to limit the issues for summary judgment, and need additional time to confer; and,
(3) the parties are discussing settlement. *See* Decl. of Thomas.

Accordingly, the following new case management deadlines are requested:

Joint Alternate Dispute Resolution Report:	5/5/2010
Dispositive Motions:	5/5/2010
Dispositive Motion Responses:	5/26/2010
Dispositive Motion Replies:	6/10/2010

This Motion is brought in good faith and not for purposes of delay.

DATED this 2nd day of April, 2010.

ROUTH CRABTREE OLSEN, P.C.

By /s/ John M. Thomas
John M. Thomas, OSB #024691
Attorneys for HSBC
11830 SW Kerr Parkway, Suite 385
Lake Oswego, OR 97035
(503) 517-7180; Fax (425) 457-7369
jthomas@rcolegal.com

CERTIFICATE OF SERVICE

I hereby certify that I served the forgoing DEFENDANT HSBC BANK USA, NA's FIRST UNOPPOSED MOTION TO EXTEND DISPOSITIVE MOTION & OTHER CASE MANAGEMENT DEADLINES and DECLARATION OF JOHN THOMAS to the following parties on April 2nd, 2010 via CM/ECF:

Hope A. Del Carlo
Oregon Law Center
921 SW Washington St., Suite 516
Portland, OR 97205
hdelcarlo@oregonlawcenter.org
Of Attorneys for Plaintiffs

Mark E. Griffin
R. Bradley Griffin
Griffin & McCandlish
215 SW Washington St., #202
Portland, OR 97204
mark@markgriffin.com
brad@griffinmccandlish.com
Of Attorneys for Plaintiffs

David S. Aman
Tonkon Torp LLP
888 SW Fifth Avenue, Suite 1600
Portland, OR 97204
david.aman@tonkon.com
Of Attorneys for Defendant Fremont Reorganizing Corporation

DATED this 2nd day of April, 2010.

By /s/ John M. Thomas
John M. Thomas, OSB #024691
Routh Crabtree Olsen, P.C.
Of Attorneys for HSBC
11830 SW Kerr Parkway, Suite 385
Lake Oswego, OR 97035
(503) 517-7180; Fax (425) 457-7369
jthomas@rcolegal.com